

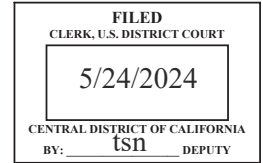
AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

NANCI JASMIN CASTILLO, and
JONATHAN GONZALEZ-REYES

Case No. 8:24-mj-00233-DUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/23/21, 9/20/21, 9/21/21, 9/25/21 in the county of Orange in the
Central District of California, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2251(a)

Production of Child Pornography (all Defendants)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)

Distribution of Child Pornography (Defendant GONZALEZ-REYES only)

18 U.S.C. § 2422(b)

Use of a Facility of Interstate Commerce to Attempt to Induce a Minor to Engage in Criminal Sexual Activity (Defendant CASTILLO only)

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

/s/

Complainant's signature

FBI Special Agent Gitana Gotay

Printed name and title

Sworn to before me and signed in my presence.

Date: May 24, 2024
*Judge's signature*City and state: Los Angeles, CA

Hon. Stephanie S. Christensen, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Gitana Gotay, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint against and arrest warrants for Nanci Jasmin Castillo ("CASTILLO") and Jonathan Gonzalez-Reyes ("GONZALEZ") for violations of 18 U.S.C. § 2251(a): Production of Child Pornography (both CASTILLO and GONZALEZ); 18 U.S.C. § 2252A(a)(2)(A), (b)(1): Distribution of Child Pornography (GONZALEZ only); and 18 U.S.C. § 2422(b) (Use of a Facility of Interstate Commerce to Attempt to Induce a Minor to Engage in Criminal Sexual Activity (CASTILLO only) (the "Subject Offenses").

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF SPECIAL AGENT GITANA GOTAY

3. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and have been so employed since May 2017. I am currently assigned to the Los Angeles Field Office where I have been working on the FBI Human Trafficking Task Force

("HTTF") since October 2021. Through my work with the FBI, I have participated in several investigations related to human trafficking, including but not limited to violations of Title 18 U.S.C. § 1591, Sex Trafficking of a Minor or by Force, Fraud, or Coercion; Title 18 U.S.C. § 1594(c), Conspiracy to Commit Sex Trafficking of a Minor or by Force, Fraud, or Coercion; Title 18 U.S.C. § 2251, Sexual Exploitation of a Minor; Title 18 U.S.C. § 2422, Coercion and Enticement of a Minor for Illegal Sexual Activity; Title 18 U.S.C. § 2252, Possession of Child Pornography; and Title 18 U.S.C. § 1470, Transfer of Obscene Matter to a Minor.

4. In my capacity as an SA for the FBI, I was assigned from approximately December 2017 until September 2021 to the Los Angeles Strike Force, a task force dedicated to major narcotics, money laundering, kidnapping, extortion, and public corruption investigations associated with transnational criminal enterprises originating from Mexico, i.e., the Mexican drug cartels. While working on the Los Angeles Strike Force, I became familiarized with the methods of operation and communication techniques utilized by narcotics traffickers for the sale, distribution, procurement and purchase of narcotics, as well as for firearms, and assisted in several investigations involving, but not limited to, violations of Title 21 U.S.C. § 846, 841(a)(1), Conspiracy to Distribute and to Possess with Intent to Distribute a Controlled Substance; Title 21 U.S.C. § 963, 951, Conspiracy to Import a Controlled Substance; and Title 18 U.S.C. § 922(a), Unlawful Dealing in Firearms.

5. Prior to becoming an FBI SA, I was a California POST Certified Peace Officer for the Los Angeles Police Department ("LAPD") for three and half years. While working patrol as an LAPD Officer, I received numerous hours of training and experience related to narcotics investigation and also assisted in several cases involving the sexual exploitation of children. Further, while working as an LAPD Peace Officer, I was assigned for three months to the 77th Division Vice Unit, where I conducted numerous human trafficking-related detentions, investigations and arrests as well as received several hours of formal and informal training from trained LAPD human trafficking experts and field supervisors.

6. As both an FBI SA and LAPD Peace Officer, I have received informal and formal training regarding human trafficking and consulted with numerous experts on this topic. Through my training, conversations, and field experience, I have become familiar with the methods of operation used by human traffickers and how people use electronic devices and social media platforms to commit such crimes. SUMMARY OF PROBABLE CAUSE

III. SUMMARY OF PROBABLE CAUSE

7. In early 2021, CASTILLO and GONZALEZ befriended a 13-year-old girl ("Victim 1"), picked her up, gave her alcohol, and sexually assaulted her at CASTILLO's home in Anaheim, California. CASTILLO and GONZALEZ took pictures and videos of the sexual assault, which constitute child pornography.

8. Investigators found evidence of the child pornography in CASTILLO's iCloud account and on GONZALEZ's cell phone, which

were searched pursuant to federal search warrants. Also on GONZALEZ's cell phone, investigators discovered that GONZALEZ had distributed to CASTILLO via text message child pornography depicting Victim 1 in September 2021.

9. From approximately late August 2021 to late November 2021, Victim 1 was living at a group home in Los Angeles County, where she had been placed by the California Department of Children and Family Services ("DCFS"). Additional evidence from GONZALEZ's phone included a text message exchange from September 2021. This text conversation showed that both GONZALEZ and CASTILLO knew Victim 1 was a minor. In this conversation, they also discussed how to help Victim 1 legally emancipate herself, change her identity, or otherwise help her run away from the group home. They then discussed having a third party pick Victim 1 up from her group home.

10. Evidence from CASTILLO's iCloud account showed that, sometime in or before September 2021, CASTILLO attempted to entice Victim 1 to have sex with CASTILLO and GONZALEZ. In exchange, CASTILLO agreed to pick up Victim 1 from Victim 1's group home. CASTILLO told Victim 1 she could spend the night in a motel room with CASTILLO and GONZALEZ.

11. Evidence from CASTILLO's iCloud and social media showed that CASTILLO invited other teenage girls to spend time with CASTILLO and GONZALEZ at motels and that CASTILLO and GONZALEZ spent time with at least one minor girl in a hotel in Las Vegas.

12. On or about May 8, 2024, Victim 1 exchanged messages with GONZALEZ via Instagram. After Victim 1 asked GONZALEZ to send her the photos described above, GONZALEZ threatened Victim 1: "If ur actually stupid enough . I won't hesitate 'fix' situation."

IV. BACKGROUND ON CHILD EXPLOITATION OFFENSES, COMPUTERS, THE INTERNET, AND DEFINITION OF TERMS

13. In this affidavit, the terms "minor," "sexually explicit conduct," "visual depiction," "producing," and "child pornography" are defined as set forth in 18 U.S.C. § 2256. The term "computer" is defined as set forth in 18 U.S.C. § 1030(e)(1).

14. Based upon my training and experience in the investigation of child pornography, and information related to me by other law enforcement officers involved in the investigation of child pornography, I know the following information about the use of computers with child pornography:

a. Computers and Child Pornography. Computers and computer technology have revolutionized the way in which child pornography is produced, distributed, and utilized. Child pornographers can now produce both still and moving images directly from a common video camera and can convert these images into computer-readable formats. The use of digital technology has enabled child pornographers to electronically receive, distribute, and possess large numbers of child exploitation images and videos with other Internet users worldwide.

b. Internet. The term "Internet" is defined as the worldwide network of computers -- a noncommercial, self-governing network devoted mostly to communication and research with roughly 500 million users worldwide. The Internet is not an online service and has no real central hub. It is a collection of tens of thousands of computer networks, online services, and single user components. In order to access the Internet, an individual computer user must use an access provider, such as a university, employer, or commercial Internet Service Provider ("ISP"), which operates a host computer with direct access to the Internet.

c. The following definitions:

i. "Child erotica," as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors engaging in sexually explicit conduct.

ii. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where: (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct; (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct; or (c) the visual depiction has

been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

iii. "Cloud-based storage," as used herein, is a form of digital data storage in which the digital data is stored on remote servers hosted by a third party (as opposed to, for example, on a user's computer or other local storage device) and is made available to users over a network, typically the Internet. Users of such a service can share links and associated passwords to their stored files with other traders of child pornography in order to grant access to their collections. Such services allow individuals to easily access these files through a wide variety of electronic devices such as desktop and laptop computers, mobile phones, and tablets, anywhere and at any time. An individual with the password to a file stored on a cloud-based service does not need to be a user of the service to access the file. Access is typically free and readily available to anyone who has an Internet connection.

iv. "Computer," as used herein, refers to "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device" and includes smartphones, other mobile phones, and other mobile devices. See 18 U.S.C. § 1030(e)(1).

v. "Minor," as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

vi. "Sexually explicit conduct," as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or pubic area of any person.

V. STATEMENT OF PROBABLE CAUSE

A. Victim 1 Reports Sexual Assault by CASTILLO and GONZALEZ

15. I learned the following information from speaking with Los Angeles Sheriff's Department ("LASD") Detective Nam, reviewing law enforcement reports and recorded interviews, and observing a child forensic interview of Victim 1 on or about May 10, 2024.

16. In October and December 2021, Detective Nam spoke with a then-13-year-old girl ("Victim 1") who had been housed at a group home for minors in Los Angeles County, specifically Acton, California.

a. According to Detective Nam, Victim 1 had run away from the group home and was believed to be with CASTILLO. Although Victim 1 was initially reluctant to talk about CASTILLO, she eventually told Detective Nam that CASTILLO had picked Victim 1 up from the group home on several occasions.

b. Victim 1 told Detective Nam about an instance of sexual assault by CASTILLO and GONZALEZ in or about March 2021.¹ Victim 1 reported that CASTILLO picked up Victim 1 and gave Victim 1 alcohol after Victim 1 had already taken a Xanax. Victim 1 was going in and out of consciousness after drinking the alcohol. She woke up later at CASTILLO's home in Anaheim, California. Victim 1 was naked and had trouble staying awake. CASTILLO and GONZALEZ were also naked and kept trying to perform sexual acts on Victim 1. Victim 1 tried to move away from them but continued going in and out of consciousness. As far as Victim 1 was aware, the sexual assault was vaginal and occurred while Victim 1 was unconscious.

c. According to Victim 1, on a later date, GONZALEZ showed Victim 1 a photo from the sexual assault, and in the photo Victim 1 was pictured naked in bed with CASTILLO. As explained below, I later found on GONZALEZ's phone a child pornography image that appears to be the same as, or similar to, the photo that Victim 1 described. I also found other images and videos that appear to have been created during the same incident.

17. During the May 10, 2024 interview, Victim 1 informed the interviewer that, on or about May 8, 2024, Victim 1 exchanged messages with GONZALEZ via Instagram. After Victim 1 asked GONZALEZ to send her the photos described above, GONZALEZ messaged Victim 1: "If ur actually stupid enough . I won't

¹ Although Victim 1 believed the incident happened in March 2021, the digital device evidence I have reviewed, described below, indicates this actually occurred in late February 2021.

hesitate 'fix' situation." Based on my training and experience, and my review of the child pornography images and video produced by CASTILLO and GONZALEZ (as described below), I believe that GONZALEZ was threatening harm to Victim 1 if she cooperated with law enforcement.

B. Search of CASTILLO and GONZALEZ's Digital Devices, iCloud Accounts, and Social Media

18. Pursuant to federal search warrants, I searched GONZALEZ's Samsung cell phone (warrant issued on June 26, 2023, in case number 2:23-MJ-03187), CASTILLO's iPhones (warrant issued on July 14, 2023, in case number 2:23-MJ-03558), CASTILLO's iCloud accounts (warrant issued on August 9, 2023, in case number 2:23-MJ-04020), and CASTILLO's Instagram accounts (warrant issued on July 20, 2023, in case number 23-MJ-03636).

19. As explained in detail below, I found images of child pornography depicting Victim 1 and CASTILLO on GONZALEZ's Samsung cell phone.² From my review of his phone I discovered that, on or about September 20 and 21, 2021, GONZALEZ sent copies of the child pornography image to CASTILLO via text message. I also found a child pornography video depicting Victim 1, CASTILLO, and GONZALEZ on CASTILLO's iCloud account.³

² From my training and experience and open-source research, I am aware that Samsung is headquartered in South Korea. Therefore, the child pornography image and video captured on GONZALEZ's Samsung phone affected interstate commerce and/or was produced using materials that had been mailed, shipped, or transported in foreign commerce.

³ From my training and experience, I am aware that iCloud is an online cloud service accessible through the Internet. Therefore, because the video was found in this online cloud folder, the video must have been transported in interstate or foreign commerce.

1. GONZALEZ's Cell Phone Contains Child Pornography
Depicting Victim 1 and CASTILLO

20. On September 21, 2021, Anaheim Police Department arrested GONZALEZ for assault with a deadly weapon, inflicting corporal injury on a cohabitant, and a firearm offense, based on a domestic violence incident in which CASTILLO was the victim. I have reviewed Anaheim PD reports relating to this incident.

21. In connection with the incident, CASTILLO identified GONZALEZ as her boyfriend of approximately two years. Anaheim PD seized a Samsung phone belonging to GONZALEZ pursuant to the arrest. The government obtained a federal warrant to search that phone.

22. During my review of GONZALEZ's cell phone, I found child pornography and child erotica images depicting Victim 1, CASTILLO, and/or GONZALEZ. Specifically, the child pornography image on GONZALEZ's phone depicts the following: Victim 1, who is wearing nothing below the waist and only a lime-green partially-see-through top that is pulled down below her right breast, is lying in a bed on her left side, turned towards CASTILLO. Both Victim 1 and CASTILLO's faces are visible. CASTILLO, who is wearing a see-through multi-colored net-like top with nothing below the waist, is sitting up, turned towards Victim 1, and is grabbing Victim 1's right breast. Victim 1's vulva and part of her anus are visible in the image. Victim 1's distinctive tattoo is visible. From the angle of the image, it appears it was captured from at or near the bottom corner of the bed. From my training and experience, I believe this image

constitutes child pornography because it is a visual depiction of sexually explicit conduct, that is, lascivious exhibition of Victim 1's anus, genitals, and/or pubic area.

23. Metadata for this image shows that the image was captured on February 23, 2021 at approximately 3:19 a.m. on a Samsung SM-A215U phone, which is the same make and model as GONZALEZ's phone.

24. On May 10, 2024, during the CAFI interview, Victim 1 confirmed that the image featured Victim 1 and CASTILLO, and it was taken on the night/early morning of the sexual assault when only Victim 1, CASTILLO and GONZALEZ were present at CASTILLO's house in Anaheim.

25. Also on GONZALEZ's phone, I found images depicting Victim 1, CASTILLO, and GONZALEZ. Based on their unique attire and the bedsheets visible in the background, it appears this image was captured at or near the same time as the child pornography image described above. Victim 1 and CASTILLO are wearing the same clothes: a lime-green partially-see-through top and a see-through multi-colored net-like top, respectively. Victim 1 is lying on the bed between CASTILLO (reclined) and GONZALEZ (possibly propped up on one elbow). GONZALEZ's face is visible in one of the images. GONZALEZ is wearing a black t-shirt with a distinct lime-green and white graphic. As explained in further detail below, I found on CASTILLO's iCloud account a child pornography video depicting Victim 1, CASTILLO, and GONZALEZ that appears to be taken at or near the same time; GONZALEZ is wearing the same t-shirt in that video.

2. GONZALEZ Distributed the Child Pornography to CASTILLO

26. I also found evidence that GONZALEZ sent copies of the child pornography image described above in paragraph 22. On or about September 20, 2021, GONZALEZ messaged CASTILLO, who was using telephone number 714-951-5533 (the "5533 number")⁴. GONZALEZ has CASTILLO's number listed as "Baby Grill." In the message, GONZALEZ sent a "modified" version of the child pornography image described in paragraph 22. It appears to be the identical image but with a different filename and no creation date available in the metadata. An excerpt of the text conversation is below:

DATE/TIME	SENDER	MESSAGE
9/20/2021 5:47:43 PM	GONZALEZ	I said that shit cause I knew it would piss you off. That was to stay between you and me...there was no need to go telling everyone
9/20/2021 5:59:44 PM	CASTILLO	I'm not even mad yet I'm just sad
9/20/2021 6:15:45 PM	GONZALEZ	[GONZALEZ sent a copy of the child pornography image]

⁴ The subscriber information for the 5533 number, which was provided by T-Mobile in response to a subpoena, showed that on or about the date of the referenced messages, the 5533 number was registered to "Blas Castillo" at "926 W NORTH ST, ANAHEIM, CA 92805." "Blas Castillo" is CASTILLO's father, who has been deceased since 2019, and the provided address is CASTILLO's address of record per the California Department of Motor Vehicles (DMV). Additionally, the user of the 5533 number sent GONZALEZ numerous self-portrait photos, commonly referred to as "selfies," of CASTILLO and messages that were indicative of a romantic relationship. Per an Anaheim Police report, in September 2021, CASTILLO reported to police that CASTILLO lived with GONZALEZ and that they were in a "dating" relationship. For these reasons and others, CASTILLO was identified as the user of the 5533 number.

27. Later that evening on September 20 and into the early morning of September 21, 2021, GONZALEZ texted additional messages and images to CASTILLO, and distributed another copy of the child pornography image described in paragraph 22. From my review of the image and the metadata, it appears to be the identical image but with a different filename and no creation date available in the metadata. An excerpt of the conversation is below:

DATE/TIME	SENDER	MESSAGE
9/20/2021 11:55:06 PM	GONZALEZ	Police coming ⁵
9/21/2021 12:02:01 AM	GONZALEZ	Ima show them ur pictures too
9/21/2021 12:06:08 AM	CASTILLO	Tell them ur a bitch
9/21/2021 12:06:19 AM	GONZALEZ	Sure will
9/21/2021 12:06:24 AM	GONZALEZ	Or maybe u can
9/21/2021 12:06:26 AM	CASTILLO	Lol you can't snitch about a lie
9/21/2021 12:06:54 AM	CASTILLO	You getting officer sexy to come to my door bowchikawahwah
9/21/2021 12:06:55 AM	GONZALEZ	Told them about [Victim 1 first name] too
9/21/2021 12:06:58 AM	CASTILLO	;)
9/21/2021 12:07:06 AM	CASTILLO	[Victim 1 first name] ? Who's that
9/21/2021 12:07:13 AM	GONZALEZ	It's all fun and games now just wait
9/21/2021 12:07:26 AM	CASTILLO	Only picture on my iPhone [CASTILLO sent an image depicting a close-up of CASTILLO's face as she poses for the camera. GONZALEZ is visible in the background in profile; he appears to be resting his head on her back as she lies on her stomach.]

⁵ These messages were exchanged on the same date that CASTILLO called Anaheim PD for the domestic violence incident.

		Both are clothed. A pink filter with stars has been applied to the photo.]
9/21/2021 12:08:35 AM	GONZALEZ	[GONZALEZ sent another copy of the child pornography image]

3. CASTILLO's iCloud Account Contains Additional Child Pornography Depicting Victim 1, CASTILLO, and GONZALEZ

28. As part of this investigation, I obtained subscriber information for Apple iCloud accounts registered to CASTILLO, and then obtained a federal search warrant to search the accounts.

29. One of the iCloud accounts I searched had the Apple ID "blaslovesyou1993" with the Apple DSID 20176451232.⁶ The subscriber information showed that the account was registered to "Nanci Castillo" at "926 w North st, Anaheim, California", which, as previously stated, is CASTILLO's address of record per the California DMV. The "verified" phone number⁷ provided for the account was "714398334" (which was the telephone number for one of CASTILLO's cell phones that was seized and searched during the course of the investigation).⁸ As additional indicia

⁶ From my review of open-source records and CASTILLO's California DMV records, I am aware that CASTILLO's father's name was "Blas" and CASTILLO was born in 1993.

⁷ A verified phone number on an iCloud account is a phone number that has been confirmed and associated with the account for security purposes.

⁸ In July 2023, CASTILLO was arrested on an open warrant, and subsequently booked at LASD's Century Regional Detention Facility. Included in CASTILLO's booking property were three cell phones that CASTILLO was in possession of at the time of her arrest. On July 14, 2023, I applied for and received a federal search warrant for the three phones from the Honorable Brianna Fuller Mircheff, United States Magistrate Judge, Central District of California (Case No. 2:23-MJ-03558). During the
(footnote cont'd on next page)

of ownership, the account includes numerous self-portrait photos of CASTILLO, both alone and with others, a photo of CASTILLO holding her own California driver's license, and a photo of CASTILLO's CashApp account. The iCloud account also includes a message in which CASTILLO identifies herself by her first name: "Nanci."

30. This iCloud account contained a six-second child pornography video that appears to have been filmed by CASTILLO on a hand-held digital device, based on the angle of the video. It depicts CASTILLO performing oral sex on GONZALEZ as GONZALEZ performs digital penetration on Victim 1. GONZALEZ has two of his fingers inserted in Victim 1's vagina and is moving his hand back and forth. The faces of CASTILLO, GONZALEZ, and Victim 1 are visible. CASTILLO is heard in Spanish telling CASTILLO to "continue."

31. The backdrop and the unique attire of CASTILLO, GONZALEZ, and Victim 1 in the video are consistent with the backdrop and attire in the child pornography image described above; therefore, the video appears to have been taken during the same early morning.

4. CASTILLO Attempted to Entice Victim 1 to Have Sex with CASTILLO and GONZALEZ

32. Also on CASTILLO's same iCloud account, I found screenshots of a text conversation between CASTILLO and Victim 1. Victim 1 confirmed in her May 10, 2024 interview that

execution of the search warrant, one of the phones (an iPhone 11 bearing serial GXGKG289N72J) was determined to use telephone number 714-983-3343.

CASTILLO was texting her in this conversation.⁹ According to data from the screenshots, the screenshots were captured on or about September 25, 2021, so the conversation must have occurred on or before that date.¹⁰ As of September 25, 2021, Victim 1 was 13 years old. An excerpt of the screenshotted text conversation is provided below:

SENDER	MESSAGE
VICTIM 1	scoop me bro LMFA000 [crying face emojis]
CASTILLO	But you ready to give the chon chon up ¹¹
VICTIM 1	yuh [three emojis depicting a face with its eyes closed and mouth open; emoji of two hands touching] down asf ¹²
CASTILLO	To both of us? Shit all of us since I know you gotta get [redacted] ¹³ in in that roster
VICTIM 1	wym ¹⁴ both of u

⁹ From the appearance of the text messages in the screenshot, in which the sender's messages appear in blue bubbles, it appears that CASTILLO was sending these messages from an Apple product such as an iPhone, to another Apple product. This is consistent with the fact that CASTILLO possessed at least three iPhones, which I seized pursuant to a federal warrant. I am aware from my training and experience and open-source research that iPhones are manufactured outside of California and the United States, and therefore are an instrumentality of interstate or foreign commerce. I am also aware that Apple manufactures their products and/or uses product parts from outside California.

¹⁰ I did not find the text message conversation on CASTILLO's iPhones, which were also searched pursuant to a federal search warrant.

¹¹ In the May 10, 2024 interview, Victim 1 confirmed CASTILLO was referencing "pussy" (vagina or sex) when she used the phrase "chon chon."

¹² From my experience reviewing electronic conversations in this case and in other investigations, I believe this refers to "down as fuck," which is an expression of interest in something.

¹³ Throughout this conversation, Victim 1 and CASTILLO reference the first name of a then-minor male whose name has been redacted here to protect his identity.

¹⁴ This means "what do you mean."

	who's both of u
CASTILLO	Me & John &&&& [redacted] told me you've been hitting him up but he also wanted you to be down so none of us beg you & shit straight up Lmk I'm in Rowland about to go to Anaheim.
VICTIM 1	u n [redacted] yeah but johnthan thas yo n[***]a lol
CASTILLO	Sooo just when I ask you too bitch ! Cmon lmy ;"(But seriously if I ask you to it's okay
VICTIM 1	like johnthan fuck me?
CASTILLO	Well yeah me and him heheh the whole enchilada ima ask him to get a room for us tho so we don't gotta be quiet ?
VICTIM 1	so [redacted], johnthan, n you?
CASTILLO	Well [redacted] is on your own time since Jonathan is going to kill me for that ¹⁵ so like let's pls not ever let him find out we can kick it with him when he's at work So me n johnthan tonight you can stay with us idc Lmk I'm eating canes Addy? ¹⁶
VICTIM 1	gimme like 10 mins and i'll lyk ¹⁷ okay?
CASTILLO	Ok so do we get the room? Cause I want to stay by Disney [face emoji with floating hearts; face emoji with heart eyes]

5. CASTILLO and GONZALEZ Knew Victim 1 Was a Minor and Discussed Helping Her Run Away from the Group Home

33. On GONZALEZ's phone, I also found text messages from September 14, 2021, between GONZALEZ and CASTILLO (who was on

¹⁵ It appears from CASTILLO's statements in this conversation that CASTILLO had sexual contact with the male who would have been a minor at the time.

¹⁶ I believe CASTILLO is asking for Victim 1's address when she says "addy."

¹⁷ This means "let you know."

the 5533 number) that show they knew Victim 1 (referred to therein by her first name) was a minor. They discuss having Victim 1 emancipate herself or change her identity, and finding her a job. Then they discuss having a third party ("Alex") pick up Victim 1, and CASTILLO provides the address of Victim 1's group home. An excerpt is provided below:

CASTILLO	Baby they took [Victim 1's] phone cause she didn't go to school cause she wants to run away I'm like welll if you want to get away from them or that you legit can't have any police contact forever and you need to stay away And run away untill your an adult lol
GONZALEZ	Damn! Or changer her identity
CASTILLO	Exactly But I couldn't say that but she knows I already kinda gave her a heads up last time And get her a job at a clinic a trap shop
GONZALEZ	Or fig ...but there's still a long time till she's 18 .. she can't emancipate herself or have Amber's ¹⁸ mom adopt her?
	[. . .]
CASTILLO	Ok so ima see if Alex. Can go pick her up atleast
GONZALEZ	Alex?
CASTILLO	The lame foo He's not that far from her
GONZALEZ	Santa Clarita is by six flags..that foo in Fresno lol
CASTILLO	Lmfao he's in Palmdale
GONZALEZ	Even worse She's 14?
CASTILLO	[address of Victim 1's group home]

34. Based on my training and experience, including with sex trafficking and pimping/prostitution investigations, I am aware that Figueroa Street in Los Angeles is commonly referred to as "Fig." I am also aware that a section of Figueroa Street

¹⁸ From other digital device and social media evidence, I believe Amber was an adult friend of CASTILLO and GONZALEZ.

in Los Angeles is heavily trafficked by pimps, sex workers, sex trafficking victims, and "johns" (buyers of sex). Therefore, I believe when CASTILLO and GONZALEZ are thinking of potential jobs for Victim 1 and GONZALEZ says "or fig...", he is referring to having Victim 1 work as a prostitute on Figueroa Street.

6. Additional Evidence Relating to Victim 1 was found on CASTILLO's cell phones

35. From my review of Anaheim PD reports and court records, I learned that Anaheim PD arrested CASTILLO in July 2023 on an outstanding warrant for misdemeanor contributing to delinquency of a minor in violation of California Penal Code § 272(a)(1). The date of the crime was September 15, 2021. The underlying incident appeared to be related to CASTILLO picking up Victim 1 from her group home.¹⁹

36. Anaheim PD seized three cell phones from CASTILLO incident to arrest, and the government subsequently obtained federal search warrants for the phones.

37. On CASTILLO's iPhone 11, I found photographs taken on July 22, 2021, that depict (1) a selfie of Victim 1, GONZALEZ, and CASTILLO on the beach in Laguna Beach, California, and (2) a selfie of CASTILLO and Victim 1 (in the same outfit) in a hotel room in Anaheim a few hours later. The metadata in the images provides the date, time, and location, and shows that the photos were captured by an iPhone 11, the same model as CASTILLO's phone.

¹⁹ Cal. Penal Code § 272(a)(1) prohibits causing/encouraging a minor to fail to conform to a juvenile court order or causing/encouraging a minor to commit truancy (i.e. failing to obey a parent/guardian/custodian or repeated school truancies).

38. Additionally, other text messages between CASTILLO and GONZALEZ show on or both of them were in contact with Victim 1 during times when Victim 1's group home had reported her missing.

a. For example, Victim 1's group home reported her missing on September 18, 2021, and "found" on September 23, 2021. The day after Victim 1 went missing, CASTILLO texted GONZALEZ and said that CASTILLO was "waiting for [Victim 1's first name]," suggesting she was with Victim 1. GONZALEZ then asked if CASTILLO was going home.

b. On September 20, 2021, two days after Victim 1 went missing, CASTILLO sent GONZALEZ a text message shortly after 8:00 a.m. indicating that Victim 1 had spent the night at CASTILLO's home: "Omg I'm pooping really loud I had to laugh & I forgot [Victim 1's first name] outside sleeping & I made my self coffe and I swear haven't had 1 sip of it and I'm already hurting smells so good tho."

C. CASTILLO and/or GONZALEZ Also Spent Time with Other Minor Girls, Including Inviting Them to Motels and Spending Time with At Least One Minor Girl in Las Vegas

39. From my review of the cell phones of CASTILLO and GONZALEZ, and CASTILLO's social media accounts, I learned that CASTILLO and/or GONZALEZ spent time with teenaged girls, including at motels.

1. Evidence from CASTILLO's "spoiledbrat710" Instagram account

40. On August 28 and September 11, 2021, CASTILLO used the spoiledbrat710 Instagram account to comment on two separate

Instagram posts made by Victim 1. On the August 28 post, CASTILLO commented "Miss you baby" "get it tho ! You fine asfuck" and "love you." Victim 1 had been placed in the group home on August 23, 2021, just a few days earlier.

41. On the September 11, 2021 post, CASTILLO commented "so beautiful love you loca can't wait to see you again miss ya." Victim 1 was still living in the group home at this time. Victim 1 ran away from the group home for the first time on September 14, 2021, about three days after CASTILLO said "can't wait to see you again."

42. On an October 31, 2021 Instagram group chat that included CASTILLO, Victim 1, CASTILLO's adult female friend, and an unknown user, Victim 1 told the group that Victim 1 "was getting picked up" by CASTILLO. According to an employee at the group home, Victim 1 and a 14-year-old girl, "Minor 2" ran away from the home on November 2, 2021. On November 2, 2021, CASTILLO posted several stories on Instagram, including someone filming from a car outside the group home, CASTILLO in a car with Victim 1 and Minor 2, and CASTILLO at a shopping center with the two girls.

43. On January 6, 2021, CASTILLO posted videos and a photo on this Instagram account showing CASTILLO, GONZALEZ, a 13-year-old minor ("Minor 3") and two other women together in Las Vegas. I have been unable to find a familial or other connection between Minor 3 and CASTILLO or GONZALEZ that would explain why they visited Las Vegas together.

2. Evidence from CASTILLO's "xobabyxxo" Instagram account

44. On October 5, 2021, CASTILLO used the xobabyxxo Instagram account to exchange messages with an unknown party, who asked CASTILLO what she was doing. CASTILLO replied "Chillen kinda need a night away what's up you trying to get us a momo²⁰ and by us is me [Victim 1's first name] and some white girl [name redacted]." Victim 1 was 13 years old at this time.

45. On October 7, 2021, CASTILLO exchanged messages on Instagram with a 15-year-old girl ("Minor 4")²¹ In the early morning hours of October 7, 2021, CASTILLO asked Minor 4 to meet her at a "momo" (motel) and asked if Minor 4 needed a ride. Several hours later, CASTILLO asked "when will you be out of school," and Minor 4 asked if CASTILLO could pick her up ("scoop me ?"). Later on October 7, 2021, Minor 4 told CASTILLO, "i think i saw u today" and CASTILLO admitted she had driven past the school that Victim 1 and Minor 4 attended, looking for them: "I'm like let's go find [Victim 1's first name] it [Minor 4's first name] [. . .] Cause I'm just worried about her :(I haven't been able to take her home and she stayed in a tent the other night [...] Lool I drove by ur school like [Minor 4's first

²⁰ In the May 10, 2024 interview, Victim 1 confirmed that CASTILLO would refer to motels in text messages as "momo."

²¹ I determined Minor 4's identity and age with assistance from DCFS and LA County Probation. I provided DCFS a photo of Minor 4, and in response, they provided me the name and date of birth of a potential match who was on juvenile probation. I provided the name and date of birth of the potential match to Los Angeles County Probation, and in response, they provided a photo that I used to positively identify Minor 4.

name]!"²² CASTILLO then told Victim 3 that CASTILLO's boyfriend was asleep, and asked Victim 3 to come visit CASTILLO.

46. On October 16, 2021, CASTILLO and Minor 4 exchanged messages via Instagram. Minor 4 asked CASTILLO to pick up Minor 4 and others: "Can u scoop us?" Minor 4 then asked CASTILLO for help to make money, and CASTILLO asked what Minor 4 was willing to do: "What's your plan what you really down to do for the shmoney." Minor 4 responded, "scam n[****]s or give head & [name redacted]"²³ I think she's down to fuck em." In response, CASTILLO agreed to sex traffic Minor 4: "let's go to the beach tonight so get dolled up and ratchet wear the gold dress [emoji] from yesterday cause we about to walk that blade and see if we do better than these n[*****] ass no money [emoji] wanting hoes." About an hour later, CASTILLO messaged A.D. who was with Minor 4, and said "Now we gotta pimp y'all out and get a momo so we can get a penthouse in Vegas So tunnel vision be ready by 8:30/9."

a. Based on my training and experience, I know that "to walk the blade" means to walk in a known area for prostitution for the purpose of soliciting "johns" (individuals who want to exchange money for sex acts). Additionally, I believe when CASTILLO told Minor 4 "see if we do better than

²² CASTILLO wrote Minor 4's name with repeated letters here to mimic CASTILLO calling out to Minor 4 as CASTILLO drove past (as an example for illustrative purposes, if Minor 4's name were "Jane," CASTILLO might have written, "Jaaaaaaaaaane!").

²³ From my review of social media, iCloud accounts, and digital devices, Minor 4 appears to be referencing an adult woman with the initials "A.D.," who was friends with CASTILLO and some of the victims.

these n[*****] ass no money [emoji] wanting hoes,” CASTILLO was enticing Minor 4 to “walk the blade” for the purpose of making money. Further, CASTILLO told A.D., in reference to A.D. and Minor 4, that CASTILLO was going to “pimp y’all out.” Based on my training and experience, I know to “pimp someone out” is common street vernacular for financially profiting from having another person engage in commercial sex work. For these reasons and others, I believe the above message exchanges are evidence that CASTILLO agreed to sex traffic Minor 4.

D. Evidence of Possession of Drugs and Firearms by CASTILLO and GONZALEZ

47. I also found evidence on CASTILLO’s and GONZALEZ’s cell phones, as well as CASTILLO’s iCloud and Instagram accounts, relating to possession of firearms and drugs.

48. For example, on CASTILLO’s iPhone, I found an image depicting a person with long fingernails holding a handgun. Although the image is a close-up on a hand holding the gun, I believe it is CASTILLO because her tattoo is visible in the background. I also found an image depicting CASTILLO standing outside in a barren, desert-like area, holding what appears to be a rifle.

49. From reviewing criminal and court records, I know that on March 21, 2018, CASTILLO plead guilty to a felony charge in the Superior Court of California, County of Orange (Case No. 15CF2944), and as part of such plea CASTILLO signed an advisement and waiver of rights, which stated CASTILLO was not to “own, use, or possess any type of dangerous or deadly weapon,

including firearm ammunition." Further, from reviewing criminal records and law enforcement reports, I know that on December 2, 2023, Anaheim PD arrested CASTILLO for (1) felon in possession of a firearm, and (2) receiving stolen property, which was a shot gun. The stolen shot gun, which CASTILLO claimed as her own, was located in CASTILLO's bedroom after CASTILLO made a spontaneous statement about the shot gun while the officers were assessing placing CASTILLO on a hold for mental evaluation. A records check of the shot gun revealed it was reported stolen.

50. On GONZALEZ's phone, I found images and videos connecting GONZALEZ to drugs and guns. For example, I found a photo in which a shirtless man is holding a plastic baggie containing white, crystal-like rocks and has a gun tucked into the waistband of his shorts. Although his face is not visible in the photo, I believe GONZALEZ is depicted in this photo based on a tattoo on the person's stomach that resembles GONZALEZ's tattoo.

51. As another example, I found a photo on GONZALEZ's phone of an assortment of items laid out next to each other, including a handgun, a baggie of a white crystal-like substance, a watch, a wallet, and a BMW car key. I believe that the watch belongs to GONZALEZ because I saw photos and videos on GONZALEZ's phone that depicted GONZALEZ wearing a watch that appears to be similar or identical to this watch. I also found on GONZALEZ's phone a video in which a wallet resembling this wallet is visible on the floorboard of the passenger seat where GONZALEZ had been sitting. Additionally, I found a photo

elsewhere on GONZALEZ's phone featuring a BMW key that appears to resemble the one in the photo.

52. As another example, I found a video depicting a gun, watch, necklace, jewelry, and sunglasses next to what appears to be naked buttocks. I believe the naked person depicted in the image is CASTILLO, as there is a tattoo on the person's buttock that resembles one of CASTILLO's tattoos. Other photos and videos on GONZALEZ's phone appear to show GONZALEZ wearing the same or similar watch, necklace, and sunglasses seen in this video.

53. I believe the white, crystal-like substance in small baggies in the photos described above may be methamphetamine based on other text messages found on GONZALEZ's phone indicating that GONZALEZ and CASTILLO use methamphetamine. Messages between GONZALEZ and CASTILLO in September 2021 contain references to "pookie," "skante," and "piedra." From my training and experience, I am aware that "pookie" and "skante" are slang terms commonly used to refer to methamphetamine, and "piedra" is Spanish for "rock" or "stone," which may reference a unit of drugs.

54. On September 19, 2021, GONZALEZ exchanged messages with another user via Facebook messenger. GONZALEZ sent a photograph of what appears to be a short barrel AR-type semiautomatic weapon. GONZALEZ then texted: "800\$"

55. On September 20, 2021, GONZALEZ exchanged messages with a different user via Instagram messenger. The user texted, "Ima probably get da toy from you TMR foo?" and GONZALEZ

responded, "Which one?" "The Antonio Ramos or the Genevieve?" GONZALEZ then sent two photos of guns. GONZALEZ offered to sell one gun for \$800 and another gun for \$650: "8bills" "On sale rn" "650 for the other one." The user discussed the price, and then agreed to buy them: "Ight ima tell da homie rn" "Ayy I'ma get da AR then the other homie from da hood gonna put the rest !"

VI. TRAINING & EXPERIENCE ON INDIVIDUALS WHO HAVE A SEXUAL INTEREST IN CHILDREN

56. Based on my training and experience, and the training and experience of other law enforcement officers with whom I have had discussions, I have learned that there are certain characteristics common to individuals with a sexual interest in children and images of children:

a. Individuals who have a sexual interest in children or images of children may receive sexual gratification, stimulation, and satisfaction from contact with children; or from fantasies they may have viewing children engaged in sexual activity or in sexually suggestive poses, in person, in photographs, or in other visual media; or from literature describing such activity.

b. Individuals who have a sexual interest in children or images of children may "groom" potential child victims over a period of weeks, months, or years. This behavior may include developing a friendship or romantic relationship with the victim, complimenting or praising the victim, giving the victim access to drugs or alcohol, and spending time with the victim to gain their trust.

c. Individuals who have a sexual interest in children or images of children may collect sexually explicit or suggestive materials in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides, and/or drawings or other visual media. Individuals who have a sexual interest in children or images of children oftentimes use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts.

VII. REQUEST FOR SEALING

57. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and affidavit. I believe that sealing is necessary because the items and information to be seized is relevant to an ongoing investigation into criminal conduct involving minor victims and premature disclosure risks harm to, or intimidation of, the victims. Specifically, as explained above, GONZALEZ threatened Victim 1 after she asked about the child pornography photo via Instagram; he told Victim 1, "If ur actually stupid enough. I won't hesitate 'fix' situation." This threat is of particular concern since GONZALEZ has a criminal history involving guns and evidence on his cell phone shows he has possessed guns in the past.

58. Furthermore, disclosure of the affidavit at this time would seriously jeopardize the investigation, as such disclosure may provide an opportunity to destroy evidence, change patterns of behavior, or allow flight from prosecution. Destruction of electronic evidence is of particular concern since, as explained above, much of the evidence of the charged crimes stems from cell phones, social media, and iCloud. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on this continuing investigation and may severely jeopardize its effectiveness.

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VIII. CONCLUSION

59. For all the reasons described above, there is probable cause to believe that CASTILLO and GONZALEZ have committed violations of 18 U.S.C. § 2251(a): Production of Child Pornography (both CASTILLO and GONZALEZ); 18 U.S.C. § 2252A(a) (2) (A), (b) (1): Distribution of Child Pornography (GONZALEZ only); and 18 U.S.C. § 2422(b) (Use of a Facility of Interstate Commerce to Attempt to Induce a Minor to Engage in Criminal Sexual Activity (CASTILLO only)).

The magistrate judge has viewed the images described in paragraphs 22, 26, and 27 above, that the affiant alleges are lascivious and, thereafter, placed them inside a sealed envelope and initialed across the seal. The affiant has taken custody of the envelope and will maintain custody until all appeals have been exhausted.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 24th day of May,
2024.



HON. STEPHANIE S. CHRISTENSEN
UNITED STATES MAGISTRATE JUDGE